

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS CHERYL MARTIN
(APWU/USPS-T-6-28-37)
(April 6, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Cheryl Martin (USPS-T-6). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T6-28 State separately the number of PVS routes and the number of HCR routes in each of the following categories:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

APWU/USPS-T6-29 For each of the following types of routes, state the average miles per route and the average cost per route for PVS routes and, separately, for HCR routes:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

APWU/USPS-T6-30 You have testified (page 5, line 3) that: “The long haul network refers to transportation by HCR providers that connects postal facilities more than 300 miles apart.” What is the basis for using 300 miles for such segmentation – is it cost or operational limitations? Is this dividing line used because transportation between postal facilities that are less than 300 miles apart is less suitable for HCR providers than other, longer routes?

APWU/USPS-T6-31 You testified (p. 5, line 9) that: “Generally, a truck run that is routinely less than sixty (60) percent full is directed to a consolidation facility so that the Postal Service can take full advantage of the truck’s carrying capacity.”

- a. Is the 60% full designation of truck utilization by Mail Transfer Equipment (MTE) or by actual mail volume?
- b. Does the 60% full designation include empty MTE – that is if a full truck is carrying 50% of MTE that are fully laden and 20% of MTE that are empty, does this load run direct or through consolidation point?
- c. Has the USPS every engaged in estimating the cube utilization of routes by actual mail cube (not MTE) as a percentage of vehicle cube? If yes, provide examples.
- d. What is the basis for using 60 percent for such decisions – how is the type and size of truck factored into such decision process, and how is the costing adjusted if a smaller truck can be used that provides for 80 percent or 100 percent utilization and reduces operating cost?

APWU/USPS-T6-32 For each of the following types of routes, state how many trucks are directed for consolidation in each category, and state what percentage of trucks in category are directed for consolidation:

- Inter-Area
- Inter-Cluster

- Inter-P&DC
- Intra-P&DC

APWU/USPS-T6-33 On the limited number of plants where studies have been conducted, what is the distribution of cube utilization of vehicle dispatch of Inter- P&DC routes in the following ranges?

- 0-25%
- 21-50%
- 51-75%
- 76-100%

APWU/USPS-T6-34 Since the new Inter-P&DC trips illustrated in Figure 2 of your testimony will be longer than the trips in Figure 1 of your testimony on nine (9) of the ten (10) current routes, has this been accounted for in the potential savings of consolidation?

APWU/USPS-T6-35 Did the studies conducted account for both length of haul and cube utilization with actual plant dispatches (e.g. If all plant dispatches in Figure 1 of your testimony from A to C are 100% then in the consolidated plant scenario in Figure 2 of your testimony, every one of those trips would be circuitously routed from A to D and then the stem miles to the area formerly serviced by C to determine savings

APWU/USPS-T6-36 You testified (p. 9, line 5) that: "As a result (of Plant Consolidation), the Postal Service will be able to increase the capacity utilization of trucks that operate between plants." Does this savings percentage account for current cube utilizations and circuitous routing?

APWU/USPS-T6-37 You testified (Page 15, line 3) that: "air transportation will increase by approximately 124 million pounds annually over current mail volumes transported by air."

- a. What is the additional weight of mail containers associated with this extra mail volume?
- b. What is the current volume of mail transported by air?
- c. How does the cost of air transportation compare with ground transportation on a per pound basis?